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May 4, 2022

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Klimovitsky v. JG Innovative Industries, Inc., et al.
Case No. 21-CV-755 (MKB)(RER)

Dear Judge Reyes:

This firm represents the defendants in the above-referenced action. I write jointly with the consent of counsel for the plaintiff to respectfully request an extension of time until June 6, 2022 for the parties to submit their settlement agreement covering plaintiff's wage and hour claims asserted pursuant to the Fair Labor Standards Act and New York Labor Law to the Court for approval pursuant to Cheeks v. Freeport Pancake House, Inc., 796 F.3d 199 (2d Cir. 2015).

The parties reached a settlement of the plaintiff's claims at the mediation session held on March 15, 2022. Subsequently, our firm drafted the proposed settlement agreement which was provided to plaintiff's counsel on April 8, 2022. However, counsel for the plaintiff requires this additional time to review the settlement agreement draft with plaintiff. All parties consent to this request.

Respectfully Submitted,

/s/Nils C. Shillito

Nils C. Shillito (NS-6755)

cc: Jonathan Shalom, Esq.
Counsel for Plaintiff
(via ecf)